

# FRESHFIELDS

**Via ECF**

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

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December 4, 2024

**Re: *In re Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010 (PKC); *In re Google Digital Advertising Antitrust Litigation*, No. 1:21-cv-07001 (PKC); *Stellman v. Google LLC et al.*, No. 1:23-cv-01532 (PKC)**

Dear Judge Castel:

We write jointly on behalf of Defendants Google LLC and Alphabet Inc. (together, “Google”) and Plaintiffs Cliffy Care Landscaping LLC and Michael Stellman (together, “Advertiser Plaintiffs”) regarding Google’s Renewed Motion to Compel Arbitration and Stay Proceedings as to Plaintiffs Cliffy Care Landscaping LLC and Michael Stellman (the “Motion”) and the Declaration of Armete Mobin. ECF Nos. 889 and 891. Exhibits 1, 2, 3, and 5 to Google’s Motion and Exhibits F-K to the Mobin Declaration contain information Advertiser Plaintiffs designated as Confidential or Highly Confidential under the confidentiality order (ECF No. 685), principally personal identifying information. *See* ECF Nos. 890-1, 890-2, 890-3, 890-5, and 891. The publicly filed versions of these documents have been redacted accordingly. Much of the redacted material must be redacted under Federal Rule of Civil Procedure 5.2, but none of the redacted material is germane to the Court’s determination of the Motion and, accordingly, Google did not request that any material be considered under seal in connection with the Motion.

If the Court requires unredacted versions of any of these materials for any reason, however, Advertiser Plaintiffs and Google are ready and willing to submit unredacted versions and to file a motion to seal in accordance with Your Honor’s Individual Practice 5.

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Sincerely,

*/s/ Dena C. Sharp*

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Interim Co-Lead Counsel for Advertiser  
Plaintiffs and the Proposed Advertiser Class

*/s/ Justina Sessions*

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CC: All Counsel of Record (via ECF)